

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 26 U.S.C. § 7201 - Tax Evasion
 (3 counts)
E-filing
☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony
PENALTY:
 26 U.S.C. § 7201 - 5 years prison, \$250,000 fine, 3 year
 Supervised Release, \$100 assessment
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

INTERNAL REVENUE SERVICE

☐ person is awaiting trial in another Federal or State
 Court, give name of court

☐ this person/proceeding is transferred from another
 district per (circle one) FRCrP 20, 21 or 40. Show
 District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on
 motion of:

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a
 pending case involving this same
 defendant

☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding
 this defendant were recorded under
SHOW
DOCKET NO.MAGISTRATE
CASE NO.

Name and Office of Person

 Furnishing Information on JOSEPH P. RUSSONIELLO
 THIS FORM

☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y
 (if assigned)

CYNTHIA STIER, AUSA, TAX DIV.

 Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND
OCT - 8 2009**DEFENDANT - U.S.**

RANNI K. HILLYER

DISTRICT COURT NUMBER

CR09-00982PJH
 RICHARD W. WIEKING
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND
DEFENDANT**IS NOT IN CUSTODY**

- 1) ☐ Has not been arrested, pending outcome this proceeding.
 If not detained give date any prior summons
 was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

NORTHERN DISTRICT OF CALIFORNIA

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No } If "Yes"
 give date filed
**DATE OF
ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☒ SUMMONS ☐ NO PROCESS*

☐ WARRANT Bail Amount:

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 *Where defendant previously apprehended on complaint, no new summons
 or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

CR09-00982

PJH

UNITED STATES OF AMERICA,

V.

E-filing

FILED

OCT - 8 2009

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

RANNI K. HILLYER,

DEFENDANT(S).

INDICTMENT

26 U.S.C. § 7201 - Tax Evasion (3 counts)

A true bill.

Walt Bradley

Foreman

Filed in open court this _____ day of _____

Clerk

~~Bill~~ *Case Summary*

[Signature]

10/8/09

JOSEPH RUSSONIELLO (CSBN 44332)
United States Attorney

E-filing

FILED

OCT - 8 2009

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

PJH

CR09-00982

UNITED STATES OF AMERICA,

Plaintiff,

v.

RANNI K. HILLYER,

Defendant.

VIOLATIONS: 26 U.S.C. § 7201-
Tax Evasion (Three Counts)

OAKLAND VENUE

I N D I C T M E N T

The Grand Jury charges:

COUNT ONE: (26 U.S.C. § 7201- Attempt to Evade or Defeat Tax for 2002 tax year)

On or about the 17th day of October, 2003, in the Northern District of California, RANNI K. HILLYER, then a resident of Pleasanton, California, who during the calendar 2002, was married, did willfully attempt to evade and defeat a large part of the income tax due and owing by her and her spouse to the United States of America for the calendar year 2002, by preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of herself and her spouse, which was filed with the Internal Revenue Service. In that return, it was stated that their joint taxable income for the calendar year 2002 was the sum of \$116,085 and that the amount of tax due and owing thereon was the sum of \$37,607. In fact, as she then and there knew, their

1 taxable income for the calendar year was substantially in excess of the amount stated on the
2 return, and, upon the additional taxable income, additional tax was due and owing to the United
3 States of America.

4 In violation of Title 26, United States Code, Section 7201.

5 COUNT TWO: (26 U.S.C. § 7201- Attempt to Evade or Defeat Tax for 2003 tax year)

6 On or about the 22nd day of September, 2004, in the Northern District of California,
7 RANNI K. HILLYER, then a resident of Pleasanton, California, who during the calendar 2003,
8 was married, did willfully attempt to evade and defeat a large part of the income tax due and
9 owing by her and her spouse to the United States of America for the calendar year 2003, by
10 preparing and causing to be prepared, and by signing and causing to be signed, a false and
11 fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of herself and her
12 spouse, which was filed with the Internal Revenue Service. In that return, it was stated that their
13 joint taxable income for the calendar year 2003 was the sum of \$166,466 and that the amount of
14 tax due and owing thereon was the sum of \$39,641. In fact, as she then and there knew, their
15 taxable income for the calendar year was substantially in excess of the amount stated on the
16 return, and, upon the additional taxable income, additional tax was due and owing to the United
17 States of America.

18 In violation of Title 26, United States Code, Section 7201.

19 COUNT THREE: (26 U.S.C. § 7201- Attempt to Evade or Defeat Tax for 2004 tax year)

20 On or about the 17th day of October, 2005, in the Northern District of
21 California, RANNI K. HILLYER, then a resident of Pleasanton, California, who during the
22 calendar 2004, was married, did willfully attempt to evade and defeat a large part of the income
23 tax due and owing by her to the United States of America for the calendar year 2004, by
24 preparing and causing to be prepared, and by signing and causing to be signed, a false and
25 fraudulent U.S. Individual Income Tax Return, Form 1040, as married filing separately, which
26 was filed with the Internal Revenue Service. In that return, it was stated that her taxable income
27 for the calendar year 2004 was the sum of \$58,635 and that the amount of tax due and owing
28 thereon was the sum of \$12,628. In fact, as she then and there knew, her taxable income for the

1 calendar year was substantially in excess of the amount stated on the return, and, upon the
2 additional taxable income, additional tax was due and owing to the United States of America.

3 In violation of Title 26, United States Code, Section 7201.

4 A TRUE BILL.

5
6 Dated: October 8, 2009

Walter Bodley
FOREPERSON

7
8 JOSEPH P. RUSSONIELLO
United States Attorney

9
10 Brian Stretch
11 BRIAN STRETCH
Chief, Criminal Division

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13 (Approved as to form: Cynthia Stier)
14 AUSA STIER